

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 1:16-CR-14
	§	
PARKER RYAN LITTLE	§	

ELEMENTS OF THE OFFENSE

You are charged in Count One and Two of the information with a violation of 18 U.S.C. § 844 (e), making a false bomb threat.

The essential elements which must be proven to establish the 18 U.S.C. § 844 (e) violations are:

1. The defendant, through the use of mail, telephone, telegraph, or other instrument of interstate or foreign commerce;
2. Willfully made a threat to kill, injure, or intimidate any individual; or unlawfully to damage or destroy any building, vehicle, or other real or personal property;
3. By means of fire or an explosive.

Respectfully submitted,  
JOHN M. BALES  
UNITED STATES ATTORNEY

/s/ Chris Tortorice  
Christopher T. Tortorice  
Assistant United States Attorney  
350 Magnolia, Suite 150  
Beaumont, Texas 77701  
(409) 839-2538  
(409) 839-2550 fax  
Texas Bar No.: 24048912

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered by electronic transmission to attorney for defendant, on this the 4<sup>th</sup> day of February 2016.

/s/ Christopher Tortorice  
CHRISTOPHER TORTORICE